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7 UNITED STATES DISTRICT COURT

8 EASTERN DISTRICT OF CALIFORNIA

9 ANA MARIA WASHINGTON,

10 Plaintiff,

11 vs.

12 COMMISSIONER OF SOCIAL SECURITY,

13 Defendant

14 CASE NO.: 2:25-cv-0471-JDP

15 STIPULATION FOR EXTENSION OF TIME  
16 TO FILE PLAINTIFF'S MOTION FOR  
17 SUMMARY JUDGMENT

18 The parties, through their attorneys of record, hereby stipulate, subject to the Court's  
19 approval, to extend the time allowed for the Plaintiff to file her motion for summary judgment to  
20 June 2, 2025.

21 Good cause exists for this request. Plaintiff's counsel has worked diligently to comply  
22 with the Court's deadlines in this case. However, Plaintiff's counsel had several unexpected  
23 deadlines in early April and requires an additional 30 days to prepare the motion for summary  
24 judgment in this case.

25 On April 4, 2025, Defendant's counsel agreed to stipulate to Plaintiff's request for an  
extension of time.

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27 STIPULATION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S MOTION FOR  
28 SUMMARY JUDGMENT - 1

1 Based on the foregoing, Plaintiff's counsel requests that the court grant her request for an  
2 extension of time.

3  
4 DATE: April 6, 2025

Respectfully submitted,

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7 By: /s/ Margaret Lehrkind  
8 Margaret Lehrkind  
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14  
15 By: /s/ Justin Lane Martin  
16 Office of the General Counsel, SSA  
17 Office of Program Litigation, Office 7  
18 Social Security Administration  
19 6401 Security Boulevard  
20 Baltimore, MD 21235  
21 510-970-4808  
22 Email: justin.l.martin@ssa.gov

23 IT IS SO ORDERED.

24 Dated: April 7, 2025

25   
26 JEREMY D. PETERSON

27 UNITED STATES MAGISTRATE JUDGE

28 STIPULATION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S MOTION FOR  
SUMMARY JUDGMENT - 2